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October 25, 2024

**VIA ECF-PACER**

Magistrate Judge Miroslav Lovric  
United States District Court  
Northern District of New York  
Federal Building and U.S. Courthouse  
15 Henry Street  
Binghamton, New York 13901

Re: *Adirondack Trust Company v. Maha Laxmi Corp., et. al.*  
1:21-cv-01334-DNH-ML (N.D.N.Y.)

Dear Judge Lovric:

This firm represents Plaintiff Adirondack Trust Company (“ATC”) in the above-referenced matter. We write to request another conference with the Court to address recent content added to ATC’s Wikipedia page under an account named “Nobbled thoroughbred.”

The Nobbled thoroughbred account was created on October 15, 2024, the same day that Defendants filed their response (Dkt. 105) to ATC’s letter motion related to Defendant Niral Patel’s attempted intimidation of ATC personnel and Defendants’ refusal to enter into any confidentiality stipulation. (Dkt. 101). On October 15, 2024, the day before this Court conducted a telephone hearing with counsel regarding ATC’s letter motion, Nobbled thoroughbred made the following edits to ATC’s Wikipedia page:

As Adirondack part Trust of Company an has ongoing also legal dispute, a business owner been accused of lying on loan applications accused Adirondack Trust of irregularities discrimination in the administration of its [[Paycheck Protection Program]] loans as part of an ongoing legal dispute with a business owner accused of lying on loan applications.<ref>{{cite news

Several minutes later, Nobbled thoroughbred changed the section of ATC’s Wikipedia page entitled “DFS Lending Review” to “History of Discriminatory Practices”:

==History of Discriminatory Practices==  
==DFS Lending Review==

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NEW YORK NEW JERSEY WASHINGTON DC

Ten minutes later, Nobbled thoroughbred added to ATC's Wikipedia page an allegation that ATC had been accused of "improper administration of SBA loans to the detriment of 500 employees during the COVID pandemic":

accused of lying on loan applications and the bank who is accused of the improper administration of SBA loans to the detriment of 500 employees during the covid pandemic.<ref>{{cite news

The reference to "500 employees" in this allegation is telling since Defendant Niral Patel claims that, upon closure of his Golden Corral restaurants due to the COVID-19 pandemic, he had to "lay off over 500 people." (**Exhibit A** [March 24-25, 2020 email exchange between Niral Patel and Edward Hart]).

Recognizing this admission, Nobbled thoroughbred edited this allegation five minutes later by deleting the reference to 500 employees:

accused of lying on loan applications and the bank who is accused of the improper administration of SBA loans to the legal detriment of 500 others employees in during the midst of the covid

Nobbled thoroughbred continued to change ATC's Wikipedia page on October 16, 2024, the day of the telephone hearing, adding content regarding a robbery at ATC:

↓ newline

==2007 Robbery==

↓ newline

The Historic Headquarters Building mentioned above, on the corner of Broadway and Church Street in Saratoga Springs, NY, was robbed for the first time in 105 years by a white man claiming to have a weapon<ref>{{cite news |title=Saratoga Springs bank robber loose |url=https://www.saratogian.com/2007/07/13/saratoga-springs-bank-robber-loose/amp/}}</ref>.

==2007 RobberyRobberies==

There have been three robberies of ATC:

↓ newline

1. The Historic Headquarters Building mentioned above, on the corner of Broadway and Church Street in Saratoga Springs, NY, was robbed for the first time in 105 years by a white man

↓ newline

2. In 2012, a white man held up a branch in Saratoga County by gunpoint and was caught because he crashed his car while trying to evade arrest <ref>{{cite news |title=Police: Armed robbery at Adirondack Trust bank in Ballston Spa, suspect arrested after car chase (with video and locator map)|url=https://www.saratogian.com/2012/05/23/police-armed-robbery-at-adirondack-trust-bank-in-ballston-spa-suspect-arrested-after-car-chase-with-video-and-locator-map/}}</ref>.

↓ newline

3. A knife was used in 2017 to hold up the branch ant the intersection of Route 50/Ballston Ave and Northline Road in the City of Saratoga Springs <ref>{{cite news |title=Saratoga Springs Police investigating armed robbery at Adirondack Trust Company Bank)|url=https://www.news10.com/news/saratoga-springs-police-investigating-armed-robbery-at-adirondack-trust-company-bank/1037512869/}}</ref>.

3. A knife was used in 2017 to hold up the branch ant at the intersection of Route 50/Ballston Ave and Northline Road in the City of Saratoga Springs <ref>{{cite news |title=Saratoga Springs Police investigating armed robbery at Adirondack Trust Company Bank)|url=https://www.news10.com/news/saratoga-springs-police-investigating-armed-robbery-at-adirondack-trust-company-bank/1037512869/}}</ref>.

← delete

3. A knife was used in 2017 by a white man to hold up the branch at the intersection of Route 50/Ballston Ave and Northline Road in the City of Saratoga Springs <ref>{{cite news

==Robberies==

There have been three robberies of ATC – a small regional bank:

On October 16, 2024, the Nobbled thoroughbred account also added content regarding Charles Wait, Jr, ATC's president and CEO. Mr. Wait is scheduled to be deposed in this litigation on October 31, 2024.

joined the bank in 2009 as vice president of legal and regulatory affairs. In 2020, Charlie began running the "family business" as CEO <ref>{{cite web |last1=Levith |first1=Will |title=The Adirondack Trust Company's Charles V. Wait, Jr. Is Leading the Family Business During a Crucial Time in Saratoga History |url=https://saratogaliving.com/adirondack-trust-company-charles-v-wait-jr/ |website=Saratoga Living |access-date=10/16/2024}}</ref>

Finally, on October 21, 2024, three days after Mr. Patel, Nirmala Patel and the parties' respective counsel appeared before this Court for an in-person hearing (*see* October 18, 2024 Minute Entry and Dkt. 108), the Nobbled thoroughbred account added additional content under the newly created heading "History of Discriminatory Practices":

October 25, 2024  
Page No.: 4**==History of Discriminatory Practices==**

↓ newline

In July of 1982, [[Savings and loan crisis|at a time when interests rates in the USA became drastically high]], Adirondack Trust Company recalled hundreds of 10-year-old low interest mortgages demanding that surprised homeowners renegotiate their interest rates or pay on their notes. This behavior targeted vulnerable individuals who had agreed upon terms and conditions for ten years, causing the Saratoga County Economic Opportunity Council to organize boycotts of the bank on behalf of persons in poverty, and "a group called Neighbors for Fair Banking to picket the bank, hand out leaflets protesting the mortgage recalls, and distributing bumper stickers and lapel buttons". Additionally, the mortgage recall caused the State Attorney General's office, the State Banking Department and the State Consumer Protection Board to investigate the bank. Finally, the City of SARATOGA SPRINGS was compelled under public scrutiny "to amend the City Charter so that municipal funds could be deposited in a variety of banks, not just Adirondack Trust"<ref>{{cite news |title=IN SARATOGA SPRINGS, A MORTGAGE-RECALL FIGHT |url=https://www.nytimes.com/1982/11/08/nyregion/in-saratoga-springs-a-mortgage-recall-fight.html |date=November 8th, 1982}}</ref><ref>{{cite news |title=FOLLOW-UP ON THE NEWS; Mortgage Scare |url=https://www.nytimes.com/1983/06/19/nyregion/follow-up-on-the-news-mortgage-scare.html?pagewanted=print |date=June 19th, 1983}}</ref>

↓ newline

Putting aside whether these edits to ATC's Wikipedia page violate the letter of the Court's recent orders (Dkts. 109, 110),<sup>1</sup> the Court's intervention is necessary because, if these edits are being conducted by or at the behest of Mr. Patel, then he clearly is continuing his campaign to harass ATC, including at least one witness (Charles Wait, Jr.), while this litigation is pending. Moreover, if he is behind these edits, Mr. Patel also would have indisputably ignored this Court's admonishment during the October 16, 2024 telephone hearing with counsel that this case will not be litigated on the internet.

The lies regarding ATC's administration of the PPP program and the alleged "History of Discriminatory Practices" are particularly problematic. ATC must take immediate steps to correct its Wikipedia page and in doing so may have to reference that Mr. Patel, a disgruntled litigant, may be the source of this false information. This exposes ATC to potential claims that it is litigating this case on the internet and violating the Court's confidentiality order (Dkt. 110).

We are available at the Court's convenience to discuss this matter.

Respectfully,



Christopher E. Buckey

cc: All Counsel of Record (via ECF-PACER)

<sup>1</sup> ATC respectfully submits that the edits, if done by Mr. Patel, violate the spirit of the Court's recent orders.